

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

P # 1
OF 3

STATE OF WASHINGTON

Respondent,

v.

MARK GREGORY

(your name)

Appellant.

No.

42658-7-11

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, MARK GREGORY, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

I WAS NEVER ALLOWED TO, NOR DID EITHER OF MY COURT
APPOINTED ATTORNEYS EVER CONDUCT AN INVESTIGATION ON
THE (ALLEGED VICTIM), OR HER MENTAL HEALTH. THAT
WAS A RESULT OF INEFFECTIVE COUNCIL.

Additional Ground 2

THE PROSECUTING ATTORNEY BROUGHT IN TO TESTIFY, THE
DETECTIVES WHO DID NOT MIRANDIZE ME BEFORE QUESTIONING
ME. THIS SHOULD HAVE HAD A 3.5 HEARING IN WHICH
THOSE TESTIMONIES WOULD NOT HAVE BEEN ALLOWED, I AM
NOT A LAWYER, & I SHOULD HAVE NEVER AGREED TO ALLOW THOSE
TESTIMONIES. IF I HAD HAD AN EFFECTIVE COUNCIL, THERE
WOULD HAVE BEEN AN OBJECTION TO IT.

If there are additional grounds, a brief summary is attached to this statement.

Date:

3-25-12

Signature:

Mark Gregory

to sum it all up
THERE ARE 12 INCONSISTENCIES MENTIONED
IN MY APPEAL BRIEF THAT WERE TOLD BY THE
(ALLEGED VICTIM). IMAGINE WHAT A GREAT, OR
EVEN A GOOD ATTORNEY WOULD HAVE DONE ~~BE~~
WITH THESE ISSUES. IMAGINE IF ALL THE
OBJECTIONS THAT SHOULD HAVE BEEN MADE, WERE
MADE. IMAGINE IF I HAD BEEN ABLE TO RAISE
THE TEN THOUSAND DOLLARS REQUIRED TO HIRE
A REALLY GOOD LAWYER.

INSTEAD I GOT MICHELLE TAYLOR. A
LAWYER WHO TOLD ME SHE HAD BEEN A
PROSECUTING ATTORNEY IN KING CO! FOR 8
YEARS. I BELIEVE SOME VERY IMPORTANT
QUESTIONS NEED TO BE ASKED. LIKE. WHY
IS SHE NO LONGER A PROSECUTING ATTORNEY?
AND IS IT REALLY THAT SIMPLE TO JUMP
OVER FROM PLAYING OFFENSE, TO PLAYING DEFENSE?

PLEASE CONSIDER ALL OF THESE ISSUES
CAREFULLY. I HAD FAITH IN OUR JUSTICE
SYSTEM, YET I AM LOCKED IN A PRISON FOR
A CRIME THAT I KNOW IN MY HEART I
AM NOT GUILTY OF.

Mark Gregory

ANOTHER KEY ISSUE (WHICH I PLEADED WITH MY ATTORNEY TO ADDRESS IN CLOSING ARGUMENTS) IS WHO? REMOVED THE TAMPON. THE (ALLEGED VICTIM) CLAIMS THAT I PULLED IT OUT SO WE COULD HAVE SEX. WHEN IN FACT, SHE PULLED IT OUT, AND APPARENTLY TOSSED IT UNDER THE DRIVERS SEAT. COMMON SENSE WILL TELL YOU THAT IF I HAD IT IN MY HAND, I WOULD KNOW WHERE IT WAS. OR WOULD I BE STUPID ENOUGH TO LEAVE IT FOR ANOTHER PASSENGER TO FIND? I LOOKED FOR IT AND DID NOT FIND IT. I HAD ANOTHER TAXI DRIVER, WHO DRIVES THAT SAME TAXI AT 5:00 AM. ALSO I AM NOT JUST A DRIVER FOR BUMBLE BEE TAXI, I WAS AT THAT TIME THE OWNER OF THE COMPANY, YET ANOTHER FACT MY LAWYER WOULD NOT ADDRESS.

I BELIEVE THAT THE JUDGE ACTED IMPROPERLY WHEN HE ALLOWED (PAGE 298-303) THE CHARGE OF ASSAULT 4 WITH SEXUAL MOTIVATION TO BE PURSUED. THE JUDGE EVEN STATED: HOW CAN YOU INTEND TO COMMIT A FELONY IF IT DOESN'T INVOLVE INTENT. ALSO HE STATED (P 299) THERE'S ONLY AN ASSAULT IF THERE IS RESISTANCE. THIS SHOULD NOT HAVE BEEN ALLOWED. AND ONCE AGAIN THERE WAS NO OBJECTION FROM MY IN EFFECTIVE LAWYER.